Safer practice, safer learning

A whole-organisation approach to safeguarding vulnerable adults for the learning and skills sector

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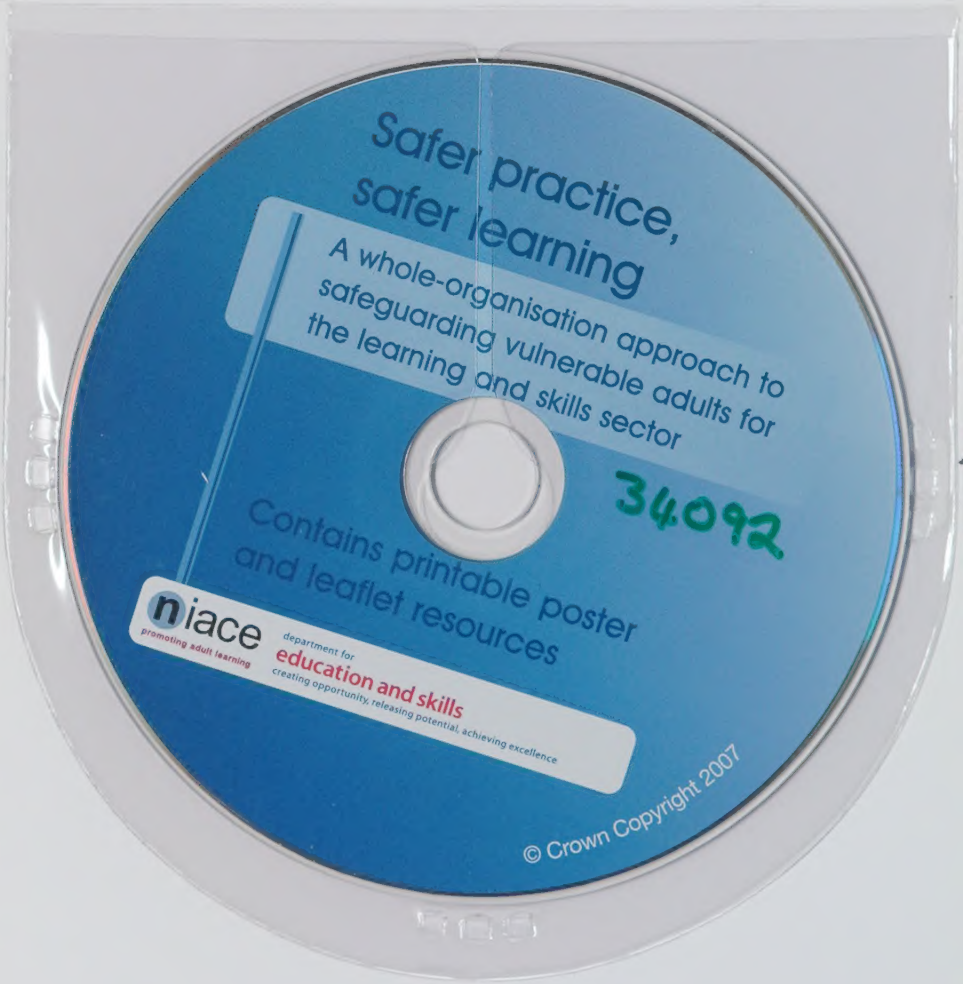

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National Institute of Adult and Continuing Education (England and Wales)
21 De Montfort Street
Leicester LE1 7GE

Company registration number: 2603322
Registered charity number: 1002775

NIACE has a broad remit to promote lifelong learning opportunities for adults. NIACE works to develop increased participation in education and training, particularly for those who do not have easy access because of class, gender, age, race, language and culture, learning difficulties or disabilities, or insufficient financial resources.

You can find NIACE online at: www.niace.org.uk

Copies of this publication can be obtained by quoting ref. 00491-2007BKT-EN from:

DfES Publications
PO Box 5050
Sherwood Park, Annesley
Nottingham NG15 0DJ

Tel: 0845 60 222 60
Fax: 0845 60 333 60
Email: dfes@prolog.uk.com

ISBN: 978-1-84478-952-8

Designed and typeset by Creative by Design Ltd, Paisley, Scotland
Printed and bound in the UK by Aspect Binders and Print Ltd
Images adapted from CHANGE picture bank

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Acknowledgements

The Department for Education and Skills (DfES) would like to thank NIACE for preparing these guidelines, in particular Dr Christine Nightingale, Development Officer, Inclusive Learning, who prepared the guidelines, and Caroline Law, Research Assistant, for her consultation with learners and the final development of the learner materials.

Also thanks go to those who contributed their time and shared their knowledge in the preparation of these resources including:

- all the provider organisations who sent copies of their employment policies and procedures;
- all the provider organisations who sent copies of their safeguarding policies and procedures;
- the NIACE-formed Safeguarding and Vulnerable Adult Protection Expert Practitioners' Advisory Group;
- the NIACE-formed Safeguarding Project Advisory Group, including:
  - The National Union of Students (NUS)
  - Unison
  - Centre for Excellence in Leadership (CEL)
  - MacIntyre Care
  - Association of Teachers and Lecturers
  - Student Volunteering England
  - Learning and Skills Council (LSC);
- the DfES Learning and Skills Safeguarding Stakeholders' Group;
- the Learners' Network – NIACE; and
- all the learners and practitioners who responded to the various consultation processes and to those provider organisations who hosted project development visits.

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Background

Chapter 1: Introduction

Education providers of post-16 learning and skills (referred to in this guidance as 'provision' or 'providers') have responsibilities to ensure the safety of children, young people and those adults deemed 'vulnerable'. A vulnerable adult is defined as a person 'who is or may be in need of community care services by reason of mental or other disability, age or illness; and who is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation' (Department of Health, 2000).

Following the publication of the Safeguarding Vulnerable Groups Act in 2006, a new vetting and barring scheme will be established from autumn 2008. In 2006 the DfES produced *Safeguarding Children and Safer Recruitment in Education*. This guidance was aimed at local authorities, schools and further education colleges in England who are responsible for promoting the welfare of children and young people, up to the age of 18. Its use is also encouraged by other LSC-funded providers. Following this, *Safer Practice, Safer Learning* has been produced to provide guidance in relation to adults in the further education system. These guidelines are consistent with and refer to the DfES (2006) guidance on safeguarding children.

Scope of the guidance

Safer Practice, Safer Learning sets out the safeguarding responsibilities of further education colleges, adult and community learning providers and providers of work-based training in the learning and skills sector in England.

Fortunately, cases of abuse in education and training provision are rare. However the reporting, to trusted staff, of abuse that occurs outside of the training and learning environment, is not uncommon. Education and training providers need to be prepared to deal with all aspects of creating a safer environment. *Safer Practice, Safer Learning* offers guidelines to education and training providers on producing supporting policies and procedures, as well as suggestions for raising awareness of abuse with strategies to deal with it among staff and learners.

Most importantly, this guide recommends creating a 'safer' learning environment that promotes well-being and security, essential for all learners and all staff. While it is important to recognise that certain groups of people are legally identified as vulnerable, and to have relevant policies, procedures and practices in place, it is better to have fully inclusive and integrated 'safer' practices that apply to all staff and learners. This creates a safer environment for all.

Relevant legislation and guidance

The Department of Health (DoH) (2000) document *No Secrets* specifies a definition of 'vulnerable adults'. Other relevant legislation includes the Disability Discrimination Acts, the Mental Capacity Act 2005 and other equalities legislation. A full list of legislation that applies to children in particular and to vulnerable adults to various extents is listed in the DfES (2006) guidance *Safeguarding Children and Safer Recruitment in Education* (1.6–1.8).

The Safeguarding Vulnerable Groups Act sets out the type of activity in relation to children and vulnerable adults for which employers and individuals will be subject to the requirements of the new vetting and barring scheme. It also creates a new Independent Barring Board to take all discretionary decisions on whether individuals should be barred from working with children and/or vulnerable adults. Further guidance on this will be produced in due course. The new scheme will be phased in from autumn 2008.

Safer Practice, Safer Learning presents new guidelines designed to complement the DfES guidance on children and young people by focusing specifically on vulnerable adults.

Chapter 2: Safeguarding from harm

This chapter identifies conduct that endangers vulnerable adults. It goes on to describe some of the specific definitions other governmental departments have adopted to describe harmful or abusive activities.

Safeguarding is a term used to denote the duties and responsibilities that those providing a health, social or education service have to carry out/perform to protect individuals from harm. Specifically, the DfES (2006) has stated that the objective of safeguarding, in relation to children, is to provide a safe environment to learn in and to identify those suffering or likely to suffer significant harm; it is then to take appropriate action to ensure that these children are kept safe both at home and in the education setting. To do this it must include safer staff recruitment and should include safeguarding policies and an overarching strategic purpose to create/maintain a safe and secure environment. *Safer Practice, Safer Learning* recommends that safeguarding duties extend to whole organisation policies, values and ethos, and include all staff and learners. It is better to be broad in scope and safer as a provider in order to ensure a safer environment.

A vulnerable adult can be put at risk of harm through a variety of actions, inadequate policies and procedures, and failures to act. Various definitions of abuse are widely available; this guidance refers to the six types of abuse defined by the Department of Health, as set out below.

Abuse

The definitions of abuse have become more sophisticated as the legal and medical systems have increasingly recognised events and behaviours that infringe on individuals rights and/or do harm. For the purposes of this document we will refer to the definitions used by the Department of Health in their guidance *No Secrets: Guidance on Developing and Implementing Multi-agency Policies and Procedures to Protect Vulnerable Adults from Abuse* (2000) and in the DoH, Home Office and Department for Education and Employment (DfEE) (1999) document, *Working Together to Safeguard Children*. The DoH (2000) states that:

> *Abuse is a violation of an individual's human and civil rights by any other person or persons.*

It continues:

> *Abuse may consist of a single act or repeated acts. It may be physical, verbal or psychological, it may be an act of neglect or an omission to act, or it may occur when a vulnerable person is persuaded to enter into a financial or sexual transaction to which he or she has not consented, or cannot consent. Abuse can happen in any relationship and may result in significant harm to, or exploitation of, the person subjected to it.*

A review of the literature shows a high level of agreement among governmental and other agencies about the characterisation of abuse. Currently the Department of Health identifies six categories of abuse: physical; sexual; psychological/emotional; financial or

material; neglect and acts of omission; and discriminatory. These have become better known in the further education system in recent years. Definitions of these follow.

Physical abuse

This may include 'hitting, slapping, pushing, kicking, misuse of medication, restraint or inappropriate sanctions' (DoH, 2000, p. 9).

Further definitions of physical abuse that include feigning or causing ill health are offered in a joint publication from the DoH, Home Office and DfEE (1999, p. 5).

> *Physical harm may also be caused when a parent or carer feigns the symptoms of, or deliberately causes ill health to a child whom they are looking after. This situation is commonly described using terms such as factitious illness by proxy or Munchausen syndrome by proxy.* (DoH, Home Office, DfEE, 1999, p. 5)

Some of the recognised signs of physical abuse are:

- unexplained burns;
- scratches;
- bruising and abrasions;
- drowsiness from misuse of medication; and
- anxiety in the presence of an abuser.

Sexual abuse

This may include 'rape and sexual assault or sexual acts to which the vulnerable adult has not consented, or could not consent or was pressured into consenting'

(DoH, 2000, p. 9). Sexual abuse also includes forcing a person to look at pornographic materials.

Some of the recognised signs of sexual abuse are:

- changes in behaviour;
- torn, stained or bloody underclothing;
- bruising around breasts or genital area;
- sexually transmitted diseases;
- difficulties in walking or sitting; and
- sexualised behaviour.

Psychological/emotional abuse

Most definitions of abuse generally include either psychological or emotional abuse. There is a strong similarity between the descriptions of these. Emotional abuse is generally described as an element of psychological abuse.

Psychological abuse may include emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation or withdrawal from services or supportive networks (DoH, 2000).

Some of the recognised signs of psychological or emotional abuse are:

- fear;
- passivity;
- confusion;
- apathy;
- lack of eye contact;
- low self-esteem;
- disturbed sleep patterns; and
- reluctance to talk openly.

Financial or material abuse

This may include 'theft, fraud, exploitation, pressure in connection with wills, property or inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits' (DoH, 2000, p. 9).

Some of the recognised signs of financial or material abuse are:

- loss of jewellery and personal property;
- lack of money to purchase basic items;
- a bill not being paid when money is entrusted to a third party;
- inadequate clothing;
- unexplained withdrawal of cash; and
- loss of money from a wallet or purse.

Neglect and acts of omission

This may include 'ignoring medical or physical care needs, failure to provide access to appropriate health, social care or educational services, the withholding of the necessities of life, such as medication, adequate heating and nutrition' (DoH, 2000, p. 9).

Some of the recognised signs of neglect and acts of omission are:

- dehydration;
- infections;
- malnutrition; and
- hypothermia.

Discriminatory abuse

This may include abuse, bullying and harassment based on the individual's age, sex, disability, religion, race or ethnicity or sexual orientation (DoH, 2000, p. 9).

Some of the recognised signs of discriminatory abuse might be very similar to psychological and emotional abuse.

Although all these forms of abuse are now better analysed and documented not all have been fully recognised by education and training provision in the past. These guidelines recommend that education and training providers should formally recognise all six areas of abuse as identified by the DoH (2000).

Who is vulnerable to abuse?

The Department of Health specifically defines vulnerable adults, and certainly these individuals must be a priority for all education and training providers. It must not be forgotten, however, that any adult could potentially be the victim of abuse. It should be the duty of providers in the learning and skills sector to ensure that they have taken proper steps to safeguard learners. This is why this guidance refers to 'whole organisation' and 'inclusive' approaches to safeguarding vulnerable adults. Often providers will work with both young people and adults, so ensuring that a safe learning environment for all must be driven by an overall policy, with specific actions identified for particular groups or individual learners as needed.

What you should do

- Review whether your organisational values, ethos, policies and procedures reflect the requirement to create and maintain a safer learning and training environment.
- Review the extent to which staff and learners understand what abuse is and then take appropriate measures to increase knowledge and understanding.

2

A whole-organisation approach to safeguarding

Chapter 3: Creating a quality framework for protecting vulnerable adults from abuse and neglect

A whole-organisation approach to safeguarding

This chapter recommends that all providers in the learning and skills sector consider how the whole of their organisation can implement safer working practices, environments and policies. A safer learning environment is more than safer recruitment of staff, and it is also more than protecting vulnerable adults from harm. These are both vitally important, but should be seen as part of a jigsaw of strategies and processes that are encompassed by an ethos of well-being, safety and security, which applies to all learners and all staff.

The following chapters will explore strategic approaches to safeguarding, learner involvement and dissemination activities. This chapter develops a quality framework for assessing the extent to which safeguarding policy and practice are embedded and are effective across the whole organisation.

Responsibilities for protecting vulnerable adults from abuse and neglect must be identified within each education and training provider. Education providers must take appropriate advice and make contact with local safeguarding committees. Safeguarding, personal safety and security issues should be embedded in the ethos and mission statement and the quality processes of education and training providers. How this is done

will depend on the kind of institution and how it is constituted. Local authorities will have specific duties for child and vulnerable adult safeguarding both as social care and education providers. Where the education or training is provided by the local authority, it will be the authority's responsibility to ensure overall procedures are in place, and that the individual centres of provision have proper procedures.

Providers that are independent of local authorities, such as independent colleges, further education colleges and independent training organisations, must identify sources of advice, support and access to training. This may be in conjunction with the local Safeguarding Board who can be contacted through the local authority. Providers must also develop policies and procedures in relation to safeguarding.

Each provider must review and develop their strategic, support and operational responsibilities as outlined in the DfES (2006, 2.12–2.17) guidance for children and young people, and adapted below:

- *Strategic* – developing a policy for safeguarding and monitoring the effectiveness of its implementation, planning and co-ordinating delivery of services, and allocating resources and working in partnership with other agencies (for example healthcare and social services' child and vulnerable adult safeguarding teams) and local Safeguarding Boards or partnerships as appropriate. Identify a senior named person to have specific responsibility for safeguarding issues.
- *Support* – ensuring that all staff and volunteers are aware of their responsibilities for safeguarding vulnerable adults and creating an environment that

promotes well-being and ensures personal safety and security.

- *Operation* – ensuring that a safer environment is provided for vulnerable adults, and that policies and procedures are put into operation for recruiting staff and volunteers, risk assessments, record keeping and dealing with allegations of abuse. In the case of abuse having taken place there should be clear arrangements to support individuals as the top priority and consideration, and also the wider learner, staff and local community as appropriate.

It is advised that providers of education and training consider their safeguarding vulnerable adult responsibilities within a wider strategic management and quality framework. It is suggested that this is done by incorporating the principle of a safer learning and training environment into the organisation's mission statement, strategies and plans and as part of usual business processes.

Embedding quality processes in safeguarding practice

The setting of strategic questions, standards or statements is an important element in the quality assurance process. Standards are the framework upon which self-assessment questions can be asked about the state of the provision.

Arguably, the quality process and any subsequent inspection or evaluation of that quality process is one effective way of ensuring that practice, and in this instance safeguarding vulnerable adults practice, is checked.

In order to create the following framework of questions or statements we referred to two existing sets of standards: *Good Governance Standard for Public Service* and *Safeguarding Adults* (ADSS, 2005). Additionally, the Common Inspection Framework includes safeguarding and providers should be aware that Ofsted will include the provision of a safe learning environment within its inspection reports.

The following framework of questions (Table 1) encapsulates the duties and responsibilities set out by the DfES (2006) and those actions recommended by these guidelines. They are guidelines only; it is the responsibility of each education and training provider to identify the most appropriate strategic approach and adapt these to their circumstances.

Table 1. *A quality framework for protecting vulnerable adults from abuse and neglect*

	Theme	To what extent:	Evidence
1	**Partnership**	• is there a commitment to working with existing local safeguarding or adult Safeguarding Boards and other health and social care partnerships?	
2	**Accountability, roles and responsibility**	• are there clear lines of accountability within the senior management, governing body or corporation of the the organisation that show where responsibility should lie? • is there a clear indication of who has the responsibility and at what level for different aspects of safeguarding vulnerable adults?	
3	**Rights and values**	• is there a clear statement that shows the organisation's values and beliefs in relation to individual rights to freedom from abuse and harm?	

	Theme	To what extent:	Evidence
		• does it state the expectation for the whole organisation to demonstrate these values through corporate and individual behaviour?	
4	**Tolerance levels**	• is there a clear statement for all learners and staff which indicates that there is zero tolerance of abuse and other harmful behaviours? • do policies and procedures direct both staff and learners towards taking appropriate actions when abuse and harmful behaviours occur? • are these policies and procedures having an impact?	
5	**Risk assessment**	• does the risk management system work in relation to safeguarding vulnerable groups?	

	Theme	To what extent:	Evidence
6	**Policy**	• are there policy and procedures for safeguarding vulnerable adults? • do all staff know about these?	
8	**Staff and volunteer recruitment**	• does the organisation demonstrate their commitment to good quality processes in the recruitment and vetting of new staff and the monitoring of existing staff and volunteers?	
10	**Capacity and capability**	• is there a clear commitment to training all staff at all levels on the issue of safeguarding vulnerable adults? • is there a range of staff training opportunities?	
11	**Information and communications**	• is information for learners and staff (on safeguarding, abuse and how to seek help) both available and accessible?	

Theme	To what extent:	Evidence
	• is there a clear communications system for issues of safeguarding, including reporting of allegations or concerns? • does information on safeguarding and health feature in all communication processes, such as on the Internet, intranet, in handbooks and on notice boards?	
12 **Curriculum**	• are personal safety rights and responsibilities embedded into the curriculum for all learners?	
13 **Including stakeholders and induction**	• has the organisation ensured that learners, trainees and other vulnerable adults are included in identifying, developing and monitoring the impact of safeguarding work, from developing the partnerships, policies and procedures to monitoring and evaluating its effectiveness? • is safeguarding part of induction for all learners and staff?	

The following chapters will specifically pick up the themes of involving learners (stakeholders), providing information, developing policies and the recruitment and vetting of staff.

To conclude, it is the responsibility of the identified accountable body for each learning and skills provider to ensure that safeguarding policies and procedures are in place, available and actively used. For specific guidance on the duties of governors and senior management please refer to the DfES guidance (2006, 2.20–2.26).

What you should do

- Assess the extent to which safeguarding vulnerable adults policy and practice is embedded throughout the whole organisation.
- Using the Quality Framework for Protecting Vulnerable Adults from Abuse and Neglect, identify how your provision can improve its policy and practice.

Chapter 4: Involving learners

As with any plan or activity to develop learning and training provision, it is vital that the stakeholders are involved. This chapter focuses on the learner stakeholder and explores some of the ways in which learners can be involved in safeguarding activities.

Sea Breeze College

As part of a learner involvement initiative, learners with learning difficulties at Sea Breeze College assessed the information the college was giving them. They decided that the college handbook for learners was inaccessible and difficult to read, so taking advice from staff about the meaning of the different sections of the handbook they advised the college on how to produce the handbook in a way that they could access using easy-read language and symbol and picture systems such as Widgit and Change Picture Bank.

Ways in which learners might be involved

Learner involvement in the management and organisation of any provision in the learning and skills sector can be measured on a continuum, from that which is strong on stakeholder advocacy to that which is directed by non-stakeholder managers and has little learner involvement (see Table 2).

Clearly, the more that learners are actively involved in quality improvement activities, the better their ownership will be of any change.

Led	Tokenism	Consultation	Representation	Participation	Self-managing

Power of the practitioner or organisation ◂▸ ◂▸ ◂▸ Power of the learner

- **Led**: The practitioner or organisation has complete authority.
- **Tokenism**: Practitioners or organisations set the agenda and take the decisions, but may consult one or two learners.
- **Consultation**: Practitioners or organisations decide what they want to ask, and how much control they want to give the learners. They are still seen as leaders.
- **Representation**: A number of learners express the views of their peers. It is important to consider which issues are not on the agenda, and how effective this approach is in practice.
- **Participation**: Joint decision-making, where all parties have some control. All responsibilities are shared.
- **Self-managing**: Learners have effective control over the decision making.

From Nightingale, C. (2006) 'Nothing about me, without me', adapted from Duffen and Thompson (1999).

Table 2. *A model for participation*

A couple of examples of ways in which learners might actively be involved in creating a safer learning environment are cited below. However, there are also many more opportunities within the learning and training experience to engage and involve learners in safer learning environment activities, for example during tutorials or through curriculum-based activities. Additionally, existing learner panels and representative committees should include well-being, personal safety and security on their meeting agendas.

Identifying safety hotspots

Learners will know, better than most other people, where in the provision the safer and less safe places are. Learners might identify where threatening behaviour, stealing, bullying or sexual abuse occurs; equally they might know where they feel safe and confident within the campus or training environment.

There are a number of ways in which learners could be involved in identifying safety hotspots, for example:

- using a map of the campus and local streets, learners highlight safety hotspots using coloured pens;
- using mind-mapping techniques, learners identify well-being, personal safety and security issues they have concerns about, and how these might be resolved;
- taking photographs with a digital or disposable camera of safer and unsafe areas; and
- displaying results of the above investigations publicly and creating a wider consultation by asking other learners and staff to respond to the findings.

Safety champions

Learners may be encouraged to become champions for a 'safer learning and training environment'. Following training in peer education and participation, learners could promote safer learning campaigns and activities.

Looking out for each other

Following an incident where a disabled learner was bullied into handing over their money, the student union created a network of safety champions. These safety champions participated in peer education training methods. They then went on to create opportunities in partnership with course tutors to engage other learners in activities and discussion around bullying and abuse.

These activities gave learners the confidence to report issues such as safety hotspots and to report to safety champions the sort of information and support they needed to feel safer. This information was fed back to the college management through the student union.

What you should do

- Work with learners to identify where they have most concern for their personal safety and well-being.
- Involve learners from the beginning in any personal safety and safeguarding plans and developments.
- Identify the extent to which stakeholders (learners, trainees) are involved in your provision – see Table 2, 'Model for participation', p. 28.
- Plan to improve it.

Chapter 5: Disseminating information on well-being, personal safety and security to learners and staff

There is always so much important information that both learners and staff should have available to them. The dissemination of information and materials to staff and learners is often well practised within each education or training setting and these routes should be exploited as much as possible to ensure that everyone is informed about well-being, personal safety and security.

This chapter explores some of the ways in which information on safeguarding vulnerable adults can be broadcasted. Learning and training providers should consider the ways in which information and knowledge about discrimination, equality, well-being, personal safety and security are conveyed and embedded in the curriculum, and how these messages are supported by the culture of the organisation, and corporate and individual behaviour.

It is highly recommended that contact is made with local safeguarding partnerships or committees, who may have training resources and information materials tailored to the local context.

Within these guidelines we offer some materials (see appendix, p. 59, and the CD) designed to give key messages about rights and responsibilities in relation to personal safety and security. Over 100 learners were contacted and consulted on the development of these.

However, these materials might need to be adapted for learners in your provision. Learners should be involved in the development of products that are both appropriate for them and the type of education or training provision they are in.

Handbooks

Many larger education and training providers give each member of staff and each learner a handbook that provides them with essential information about the organisation.

The Association of Colleges (AoC) and the Local Education Authority Curriculum Advisory Network (LEACAN) produced *Guidance for FE Colleges Providing for Young Learners* (2006). Although focused on the further education sector's needs and responsibilities to young learners, its advice can in many instances be applied to adults. In particular, it gives some helpful guidance on the content of both staff and learner handbooks.

Learners' handbooks

Drawing on evidence from learning and training provider handbooks and the AoC/LEACAN guidance (for working with young learners), it is recommended that handbooks include information about well-being, personal safety, security and safeguarding issues, such as:

- a description of the provider organisation that includes the mission statement, organisational structure with a message stating a commitment to well-being, security and a safer environment;
- what to expect from the provision regarding its commitment to learners and their safety;

- how to use the Internet, to include the college policy and practice on internet security;
- the college or provider services, to include learning support services, student services and where to go to seek help;
- reporting procedures for ill-health, health and safety incidents, abuse, bullying and harassment;
- policies and procedures on expected behaviours and codes of conduct;
- equality and diversity policies that make it clear that discrimination, abuse, harassment and bullying is not tolerated. In order to help learners understand relevant abuse terminologies it is recommended that the handbook includes materials that define harm and abuse, including sexual abuse, physical abuse, psychological or emotional abuse, financial or material abuse, neglect or acts of omission, and discriminatory abuse (see examples on pp. 10–14);
- who to contact, including personal tutors. This might include contacts for different situations such as reporting abuse, security issues or unreasonable behaviour;
- details of the induction programme. This should include sessions on individuals' rights and responsibilities in relation to personal safety, security and well-being (see examples of learner materials in the appendix, p. 59, and on the CD);
- tutorial, mentoring and pastoral support systems. This should include how to access support and counselling, both that available within the provision as well as from external bodies and providers; and
- vulnerable adult safeguarding procedures.

Staff handbooks

The AoC/LEACAN (2006) guidance (for working with young learners) also offers suggestions for topics to be addressed in staff handbooks. Again using these suggestions and evidence from provider handbooks, it is recommended that handbooks include information about well-being, personal safety, security and safeguarding issues. For example:

- the aim of the provision showing how its work fits into both the national and local context. Details of the partners, including those involved in well-being initiatives, personal safety and safeguarding vulnerable adults;
- whom to contact. This might include whom to contact for different situations such as dealing with allegations of abuse, security breaches or unreasonable behaviour;
- the services available, to include learning support services, student services, human resources, staff counselling and where to go to seek help;
- reporting procedures for ill-health, health and safety incidents, abuse, bullying and harassment;
- how to use the Internet, to include the policy and practice on Internet security;
- information, policies and procedures on expected behaviour and codes of conduct;
- the policy on providing transport and safer recruitment of transport staff for vulnerable adults;
- equality and diversity policies that make it clear that discrimination, abuse, harassment and bullying is not tolerated;
- vulnerable adult safeguarding procedures;

- details of the staff induction programme. This should include sessions on staff responsibility in relation to personal safety, security and well-being;
- the curriculum, to show where diversity issues, safer practice and appropriate conduct are embedded into the curriculum;
- safer recruitment of staff and volunteers policy with definitions and explanations of the checks and disclosures; and
- risk assessment procedures.

Learner contracts

A learner contract is an opportunity to set out the terms of learner conduct that are expected by the education or training provider, and of the conduct and learning conditions the learner should expect to receive.

- Education and training providers should agree to provide a safer and secure environment, respect for learners, pastoral support, and appropriate procedures to deal with complaints and disclosures of harm.
- Learners should agree to be on time for sessions and placements, respect the learning environment and facilities including electronic communications and Internet access, and treat others with respect.

The learner contract is a good opportunity for staff to introduce, early on, the concept of an environment where abuse, neglect and practices that place an unacceptable risk on personal safety are not tolerated. It is also an opportunity to facilitate greater understanding of well-being and personal safety.

It is recommended that the learner contract expresses the learners' rights to a safer and inclusive environment and also their (the learners') responsibilities to respect others and the environment.

Posters and information leaflets

Posters and information leaflets can be used as quick visual reminders or points of information for staff, learners and visitors alike.

This guidance contains samples of a poster and of a safer learning rights and responsibilities leaflet for learners. The leaflets have been produced in two formats, one of which is more accessible and supported by illustrations (see the Appendix and CD). These materials have been developed in consultation with learners.

It is recommended that general information leaflets and posters are kept as succinct and brief as possible. It can be tempting to put a great deal of detail into both. However, explaining complex concepts such as sexual abuse in an accessible way that learners with a wide range of experience and knowledge would understand is a very difficult task. It is recommended that short information leaflets can be used as the basis of targeted input during induction or tutorial periods, thus ensuring that the detailed explanation is learner centred and appropriate to their knowledge, experience and requirements.

Web-based resources

Increasingly learning and training providers are using their intranet systems to deliver information and training to both learners and staff. These systems can be used in at least two ways: for online training packs and information.

Online training

This may include placing training packs and the content of staff training presentations on an Internet site. Additionally, interactive training using a variety of software packages can be developed. Staff and learners' progress with online activities can be monitored centrally and used to inform regular training appraisals.

Information

This may include deposits of relevant safeguarding vulnerable adult policies, literature on well-being, personal safety and security and links to other websites.

Whole-organisation campaigns

An effective method of creating a whole-organisation approach to safeguarding is to run whole-organisation campaigns. Targeted activities, clear marketing and branding of personal safety, well-being or security activities can help to build belief among learners and staff in the organisation's commitment to the campaign.

The RESPECT campaign

Lincoln College initiated a RESPECT campaign in 2003. The aim was to protect the physical environment of the college and improve the treatment of people within it, including vulnerable adults. They strived to embed values of respect for the college and for others into all aspects of college life. Following this, many other colleges have been keen to implement their own RESPECT campaigns. For example, Peterborough Regional College have based their campaign on four components: respect yourself, respect others, respect difference and respect the environment.

Within the RESPECT campaigns posters, student handbooks and regular newsletters highlight that the particular college will not tolerate vandalism, littering, bullying and disrespectful behaviour towards others – staff, learners and visitors. All students are informed about the campaign in their inductions, and the colleges run regular tutorials based around different themes and issues, such as the effects of bullying, drugs and alcohol and respecting other cultures and faiths.

The RESPECT campaigns have their own branding and logos to raise their profiles. Colleges have produced branded materials such as wristbands, identity badges, t-shirts and water bottles. Media and performing arts students have developed production pieces and DVDs to further learners' and staff awareness of the RESPECT campaigns.

Lincoln College also hold a bullying and harassment support group run by trained staff. In conjunction with this they are developing their own 'anti-bullying' website, where students can report bullying anonymously.

Finally, whatever approach is used to disseminate information to learners, it is important to involve them throughout the process. It is also important to ensure that the information is both available and accessible, that it conveys the culture and ethos of the organisation, and that it is consistent with the policy and procedure for safeguarding.

What you should do

- Identify existing resources, beginning with your local safeguarding partnership or committee.
- Analyse the ways in which you share information with staff and learners and how effective these methods are.
- Using the best methods of communication for your provision, develop and test a range of information-providing approaches.

3

Employing volunteers and paid staff

Chapter 6: Vetting of volunteers and paid staff

This chapter details the types of checks that need to be carried out on people who intend to work with vulnerable adults in either a voluntary or employed capacity. It will explain the role of the Criminal Records Board (CRB), the application of current lists and set out the background to the Safeguarding Vulnerable Groups Act (2006). It is strongly advised that Chapters 3 and 4 of the DfES (2006) guidance *Safeguarding Children and Safer Recruitment in Education* are read in conjunction with this chapter.

Vetting staff and volunteers

All employers of volunteers and paid staff engaged in the post-16 learning and skills sector must have robust procedures that minimise the risk of recruiting unsuitable people. Vetting staff and volunteers by conducting various checks is one of a menu of actions that education and training providers should undertake when recruiting. It is important to remember that none of the processes are fail-safe, and that obtaining clear CRB or other list checks does not guarantee that the person is suitable to work with vulnerable adults. Furthermore, the nature of the job role must be looked at on a case-by-case basis and decisions about whether applicants for the role should be taken following DfES (2006) safeguarding guidance. What matters is reducing risk as much as possible. It is also important to remember that the final decision on whether to employ an individual in a paid or voluntary position rests with the named responsible person within each organisation.

The Criminal Records Bureau (CRB)

The CRB is an agency of the Home Office. It provides organisations with a police checking service and, where relevant, a DoH and DfES information search. It works strategically in partnership with the police, Capita and registered bodies. The police provide the required information from the Police National Computer and local police force information. The DoH and DfES supply information on individuals considered 'unsuitable' or banned from working with children and vulnerable adults. Capita is a private sector company which provides the administration and call centre activity/service.

Requests for CRB checks can only be submitted by a 'Registered Body'. Registered bodies are those organisations that check applications for disclosure and also check and validate the information and identity provided by an applicant before countersigning the application form.

Organisations which provide this service to other individuals or organisations are referred to as 'umbrella organisations'. For example, many larger education organisations may be registered bodies in their own right, and certainly most local authorities are. However there are other agencies that act as umbrella organisations for smaller or non-registered organisations.

There are two levels of CRB check available: Standard or Enhanced Disclosures. These checks do not have a fixed validity period, because convictable offences may be committed after a disclosure has been issued. The

CRB states:

> *Each Disclosure will show the date on which it was printed. Disclosures do not carry a pre-determined period of validity because a conviction or other matter could be recorded against the subject of the Disclosure at any time after it is issued.* (CRB, 2007)

CRB Standard Disclosure

This check is designed for anyone working with children or vulnerable adults in occupations and professions that are excepted from the Rehabilitation of Offenders Act 1974.

These disclosures will show any current or 'spent' convictions, cautions, reprimands and warnings held on the Police National Computer. It may also search the Protection of Children Act (POCA) List, Protection of Vulnerable Adults (POVA) List and Information on Section 142 of the Education Act, formerly called List 99.

CRB Enhanced Disclosure

This check is for anyone who is to be involved in regularly caring for, training, supervising or being in sole charge of children or vulnerable adults. In addition to the level of checks made for a Standard Disclosure, the Enhanced Disclosure will include a check on local police records. Where these records contain additional information that might be relevant to the post applied for, the Chief Police Officer may release this information. An Enhanced Disclosure may include 'approved information'.

CRB Approved Information

Approved Information is 'non-conviction' information provided by the police from their local records and may include, for example, information relating to circumstances where the applicant's name has been linked to a criminal activity or to an individual who has been convicted of a crime.

If the Chief Police Officer decides this information is relevant to the CRB check, the CRB will print the information on both the applicant's and the countersignatory's copy.

In some cases, in the interests of preventing or detecting crime, the Chief Police Officer will release 'additional' information to the countersignatory only. This will be sent as a letter under a separate cover. In such cases, the applicant's copy of the disclosure will not refer to this information, and it is a criminal offence to reveal the additional information contained in the letter to the applicant or any other person not involved in the recruitment decision. It is then the responsibility of the recruiting organisation to decide how to proceed in this situation. More detailed advice is available on the CRB website.

Approved Information

Mary has applied for a job as a Care Support Worker in a college. She will be carrying out personal care duties with adults who have profound and complex learning difficulties. Before she can take up her post, she is required to have an enhanced CRB check.

Mary's partner is under surveillance in connection with Internet child pornography. As Mary lives at the same address as her partner and her name is connected with this investigation, the Chief Police Officer of the local police force decides to release this additional information to the countersignatory only, who in this case is the college human resources manager. The human resources manager must not divulge the nature of the information to Mary, when they make their decision about whether to employ her.

Section 142 of the Education Act 2002/ List 99

Section 142 of the Education Act 2002 legislates for a list of persons barred from teaching children to be maintained. Commonly referred to as List 99, this list contains the names, dates of birth and teacher reference numbers of people whose employment has been barred or restricted, either on grounds of misconduct or on medical grounds. If a person's employment is restricted, the entry shows the types of employment in which he or she is permitted to work. People barred on misconduct grounds are listed separately from those barred on medical grounds, but no details of misconduct are given. Misconduct may include criminal acts, drug offences as well as sexual

offences and offences against children. The DfES state that, 'It should be emphasised that not all those on the list are perceived to be a danger to children' (see: http://www.dfes.gov.uk/publications/guidanceonthelaw/11_95/list99.htm).

Protection of Vulnerable Adults (POVA) scheme

The Protection of Vulnerable Adults (POVA) scheme is a list of individuals barred from working with vulnerable adults. Like Section 142 of the Education Act 2002 or List 99, it will act as a statutory ban on those individuals who have harmed vulnerable adults in their care. Access is restricted to regulated social care providers only.

The Safeguarding Vulnerable Groups (SVG) Act 2006

The Safeguarding Vulnerable Groups (SVG) Act lays the legislative foundation for a new vetting and barring scheme for those working with children and vulnerable adults which will be implemented from autumn 2008. The roll out of these regulations will be signalled in future guidance documents. The key features of the new scheme will be as follows.

- *Workforce coverage.* Those who work closely with vulnerable adults in a wide range of settings, in both paid and unpaid work, will be subject to the requirements of the scheme. This is a significant step forward from the existing POVA scheme, which has been implemented in regulated social care settings only.

- *Pre-employment vetting* by the scheme so that those who are known to present a risk of harm to vulnerable adults are prevented from working with these adults.
- *Centralised, consistent and independent decision making.* A new Independent Barring Board (IBB) – made up of experts – will be set up to take all discretionary decisions as to those individuals that should be placed on the barred lists that the IBB itself will maintain. Where an individual is not barred, the employer will be able to consider any additional information provided on the CRB Disclosure (such as driving or minor drugs offences), in line with the particular requirements of the job role before deciding to employ an individual.
- *The introduction of continuous updating.* Relevant new information about an individual who is already in the workforce will be transferred to the IBB to reconsider whether a ban is appropriate. The Secretary of State will notify registered employers if an individual is consequently barred.
- *The new system is to be 'portable'.* Continuous updating will mean that, in many cases, once people have been vetted for a first time, subsequent employers will be able simply to check their scheme status online.
- *Wide range of sources of information.* Employers will be under a duty to refer individuals to the scheme in certain circumstances, as will social services where there is concern relating to child or adult safeguarding. Professional bodies, such as the General Medical Council (GMC) and General Social Care Council (GSCC), as well as the regulators such

as the Healthcare Commission and Commission for Social Care Inspection (CSCI), will have a statutory relationship with the scheme, referring relevant cases and acting on barring decisions where appropriate.

- *Geographical coverage.* The scheme will cover England, Wales and Northern Ireland and will establish effective reciprocal arrangements with Scotland in order to ensure that there are no loopholes in safeguarding for children and vulnerable adults across the UK.

The full version of the SVG Act 2006 can be accessed at http://www.opsi.gov.uk/acts/acts2006/ukpga_20060047_en.pdf

A useful and detailed explanatory note, also accessible at the web address given above, gives a clear commentary on the individual sections and schedules of the Act. The annexes of the explanatory note include useful flow charts setting out how the vetting and barring scheme will operate. Further detail underpinning the mechanics and coverage of the scheme will also be given in regulations and guidance which will be published before implementation begins.

Regulated activity

The Safeguarding Vulnerable Adults Act 2006 defines a number of activities in relation to vulnerable adults as regulated activities. This will include teaching and training vulnerable adults frequently (which takes its normal meaning) intensively (defined as three or more days in any thirty-day period), or overnight. All those involved in regulated activity will need to have been centrally vetted by the scheme. Education and training

providers should wait for further guidance on the implementation of the SVG Act which will set out in more detail how individuals and employers can fulfil the requirements they will be subject to.

Referrals

Employers will be required to refer individuals that have harmed or may harm a vulnerable adult to the IBB, where that individual's employment has been terminated – or would have been had they not otherwise resigned – or they have been moved to a different set of duties. Professional and regulatory bodies will also need to refer cases to the scheme where an individual has harmed, or may harm, a vulnerable adult, the individual is involved in regulated activity, and the body thinks the IBB may consider it appropriate to bar them.

The IBB will use the information you provide to make a decision about whether that individual should be barred from working with vulnerable adults, and/or children.

What you should do

- Follow the DfES (2006) advice about safer recruitment of staff and volunteers.
- Look out for further regulations and guidance in relation to the new vetting and barring scheme in the run-up to its implementation from autumn 2008.

Chapter 7: Developing a policy and procedure on safeguarding vulnerable adults

This chapter details specific themes that should be incorporated into a provider's policy and procedures. It is strongly advised that Chapter 5 of the DfES (2006) guidance *Safeguarding Children and Safer Recruitment in Education* is read in conjunction with this chapter.

Each provider within the learning and skills sector must have clear policies and procedures on safeguarding vulnerable adults. These guidelines recommend that any strategic or operational processes should reflect a wider ethos of providing a safer learning environment that is based upon positive well-being, personal safety and security of all staff and learners. A college or other provider may have an overall policy for safeguarding covering both young people and vulnerable adults. Much good safeguarding practice is common to both groups; however, the policy should reflect the different practice necessary to ensure that vulnerable adults' needs are met.

Current policies and procedures should be reviewed in light of the forthcoming legislation and the following points should be considered:

- *Paid and voluntary staff.* Each organisation should develop recruitment procedures that reflect the guidance provided by the DfES (2006).
- *Quality assurance processes.* Policy and procedures should both refer to and adhere to overall strategic statements, standards and quality assurance processes. See Chapter 4 for guidance on

developing a quality framework for protecting vulnerable adults from abuse and neglect. The statements or questions in this chapter can provide useful headings to structure a policy.

- *Partnerships and existing external structures.* This section of policies and procedures to safeguard vulnerable adults should indicate how the provision works collaboratively with the local vulnerable groups safeguarding partnership or committee. These partnerships will have identified appropriate reporting and action procedures for vulnerable adults as well as training resources. The social-care-led partnerships should be able to provide information that will help education providers issue a clear policy and procedure on reporting suspected abuse.
- *Working with other provider organisations.* Where subcontracting of services to other organisations exists, a procedure needs to be formulated that ensures that safer recruitment and staff monitoring policies are in place. It should also ensure that the subcontracted organisation has best practice in personal safety and well-being for vulnerable adults.
- *Definitions of vulnerable groups.* Ensure that clear definitions of those deemed to be vulnerable adults are set out within the policy. These definitions should reference those set out in *No Secrets* (see p. 10 for a summary). The policy may include special reference to groups that the provision works with, for example older people in care or offenders in prison, youth offender institutions or probation settings.

However, it is important that policies on safer environments, protecting vulnerable groups, personal safety and security encompass all learners and staff.

A clear policy should be constructed on how to support vulnerable adults who have alleged that abuse has taken place. This will include contacting their social worker, next of kin or advocate as appropriate. To support the adult while investigations are being conducted a longer-term plan, that does not place them at risk of further abuse or harm, will need to be put in place.

- *Definitions of abuse and harm.* Policy should ensure that staff have a good understanding of harm and abuse. It is important that policies set out the actions that constitute harm and abuse. Abuse is defined by the DoH, and is discussed on p. 10.
- *Actions to be taken by a member of staff.* Safeguarding vulnerable adults procedures should be robust enough so that any member of staff can pick them up and understand exactly what to do if faced with an abuse situation. It is strongly recommended that procedures are produced in conjunction with the local safeguarding partnership. Their procedures will be based on the 'Safeguarding Adults' framework (ADSS, 2005). It is important that any accusation is listened to carefully and reported fully in writing. In all cases measures must be in place to support the vulnerable adult appropriately. Guidance on recording and reporting allegations and maintaining confidentiality should be sought by the policy writer from local safeguarding vulnerable adults partnerships. (Note: In future a referral to the IBB should be considered.)

- *Nominated child and vulnerable adult safeguarding officers.* The policy and procedure should indicate who is/are the nominated child and/or vulnerable adult safeguarding staff, and the procedure for contacting them.
- *Appropriate contact with learners.* Clear policies and procedures must be constructed that ensure staff and volunteers understand what is appropriate and inappropriate physical contact with learners.

In some cases this will require the expertise of curriculum managers, particularly where learners need physical guidance to adopt particular positions or to perfect a technique – such as in dance or sport. Learners with physical impairments or mobility difficulties may require physical guidance in everyday activities such as holding various implements correctly.

In all of these cases both the necessity of touch and the gaining of informed consent should be thoroughly explored.

Dealing with allegations of abuse

In all cases where there are allegations of abuse, it is vital that these are dealt with fairly, quickly and consistently. There are three main strands to be considered:

- An investigation of a possible criminal offence by the police.
- Involvement of an appropriate social care worker.
- Investigation by the education or training provider and consideration of any disciplinary action on staff or learners.

Allegations against members of staff

The policy should state what procedures will be used if an allegation is made against a member of staff. This should include immediate reporting by the nominated officer to a member of the senior staff team.

Actions should be taken both to protect vulnerable adults and the accused member of staff. These may include ensuring that the member of staff is not placed in a vulnerable situation while investigations take place. Actions may include:

- giving the staff member leave of absence on full pay;
- suspending them;
- ensuring that they are not working alone with vulnerable adults.

(Note: In future a referral to the IBB should be considered.)

Allegations about events outside of the provision

Vulnerable adults may allege that abuse or harm has occurred at home or in other situations outside of the learning and training provider's remit. It is important that these allegations are treated seriously and that the policy and procedure sets out the reporting process in these circumstances. These guidelines strongly recommend that providers work in partnership with local safeguarding partnerships or committees in dealing with these situations.

Training

A statement regarding the training of staff on safeguarding vulnerable groups should be made that includes who is to be trained and at what level, the frequency of refresher training and whether the training is mandatory.

References to associated policies

References to other relevant and associated policies should be made, such as:

- risk assessment;
- administration of medicine;
- alcohol and drug abuse;
- health and safety;
- recruitment of staff and volunteers;
- equality and diversity; and
- health and well-being.

It is suggested that where possible associated policies and procedures should be reviewed together to ensure consistency of approach tone and message.

What you should do

- Review and amend your policies and procedures that impact on service provision, vulnerable adult learners and the recruitment of staff and volunteers to ensure that they are consistent with good practice, are legal and take account of local processes.

References

ADSS (2005) *Safeguarding Adults: A National Framework of Standards for Good Practice and Outcomes in Adult Protection Work*. Association of Directors of Social Services.

AoC and LEACAN (2006) *Guidance for FE Colleges Providing for Young Learners*. At: http://www.aoc.co.uk/aoc/Members/learning_quality/younglearners/index_html

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Nightingale, C. (2006) *Nothing About Me, Without Me: Involving Learners*. London: LSDA.

Further reading

Elder Abuse Prevention Unit (2006) *Recognising Abuse*. At: http://www.eapu.com.au [30 October 2006].

The Hideout (2006) At: http://www.thehideout.org.uk [30 October 2006].

Paediatric Emergencies (2004) 'Child protection, recognition of abuse', *Paediatric Emergencies*, June 2004.

Appendix

Poster on rights and responsibilities in personal safety

Safer learning

Your rights and responsibilities

You have the right to feel safe where you learn. Other people should not hurt or abuse you in any way.

Your responsibilities are:

- to respect other people's rights to safety;
- not to hurt or abuse others; and
- not to threaten to hurt or abuse others.

Physical abuse

People should not touch you in a way that hurts.

Sexual abuse

People should not touch you or make you touch them in a way that makes you feel uncomfortable or upset.

Psychological or emotional abuse

People should not upset you by bullying or teasing you.

Financial, money or material abuse

People should not steal from you.

Neglect

If you have personal care support, people who are there to help you should not neglect you or ignore you.

Discrimination

People should not treat you badly because of your age, disability, gender, ethnicity, religion, or who you choose for your girlfriend or boyfriend.

What should you do if you think you are being hurt or abused?

If you think you have been hurt or abused by another student or learner, member of staff or visitor, you should report this as soon as possible.

Tell a trusted member of staff what is happening or contact:

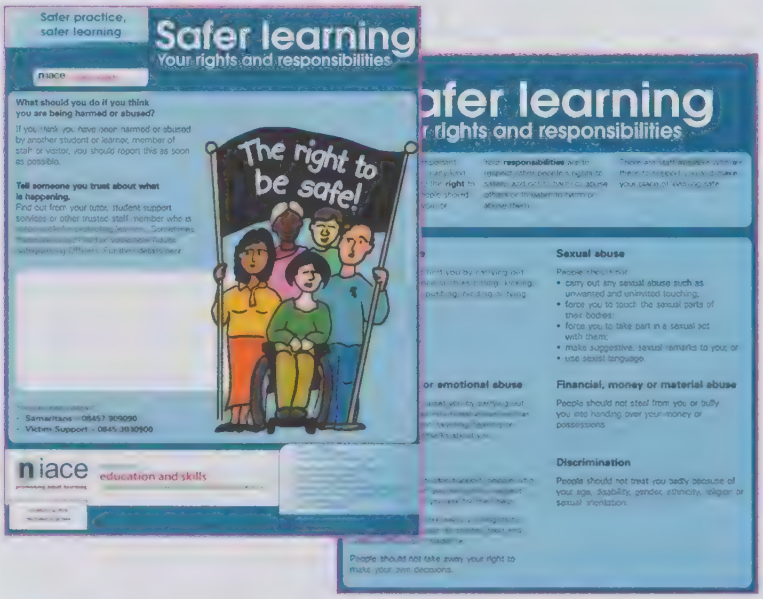
You can also contact:

- **Samaritans – 08457 909090**
- **Victim Support – 0845 3030900**

niace promoting adult learning

department for education and skills

Learner leaflets on 'Safer learning: Your rights and responsibilities



The poster and leaflets are available on the enclosed CD for you to print out.

Printed copies of the leaflets in packs of 50 are also available from Prolog.

Contact:

DfES Publications
PO Box 5050
Sherwood Park, Annesley
Nottingham NG15 0DJ

Tel: 0845 60 222 60
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Quote reference codes:

Standard version: 00494-2007LEF-EN
Accessible version: 00491-2007LEF-EN

Notes

Copies of this publication can be obtained by quoting ref. 00491-2007BKT-EN from:

DfES Publications
PO Box 5050
Sherwood Park
Annesley
Nottingham
NG15 0DJ

Tel: 0845 60 222 60
Fax: 0845 60 333 60
Email: dfes@prolog.uk.com

ISBN: 978-1-84478-952-8

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Produced by NIACE for the Department for Education and Skills.

KO-584-222

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